

MEMORANDUM ENDORSEMENT

Cook v. Suterland et al

19-cv-2780 (NSR)

The Court reviewed Defendants' attached pre-motion letter, dated September 17, 2019 (ECF No. 15). The Court has also reviewed Plaintiff's attached responses, filed on October 2, 2019 (ECF No. 17), October 24, 2019 (ECF No. 18), and December 2, 2019 (ECF No. 19.) Due to Plaintiff's incarceration, the Court waives the pre-motion conference requirement and grants Defendants leave to file their motion to dismiss with the following briefing schedule: Defendants' moving papers are to be served (not filed) on February 13, 2020; Plaintiff's opposition is to be served (not filed) on March 16, 2020; Defendants' reply is to be served on March 20, 2020.

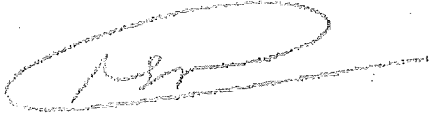
Defendants' counsel is directed to file all motion documents, including Plaintiff's opposition, on the reply date, March 20, 2020. The parties shall provide two copies of their respective documents to chambers as the documents are served.

Plaintiff's attached motions for summary judgment (ECF Nos. 20 and 21) are premature, and are therefore DENIED without prejudice to renewal at a later stage in the proceedings after sufficient discovery has occurred.

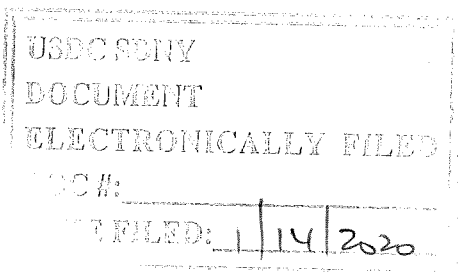
The Clerk of the Court is respectfully directed to terminate the motions at ECF Nos. 15, 20, and 21. The Clerk of the Court is further directed to mail a copy of this order to Plaintiff at Plaintiff's last address listed on ECF and to show proof of service on the docket.

Dated: January 14, 2020
White Plains, NY

SO ORDERED.



Nelson S. Román, U.S.D.J.





STEVEN M. NEUHAUS
County Executive

**Orange County
COUNTY ATTORNEY**

Langdon C. Chapman
Orange County Attorney

Orange County Government Center
255-275 Main Street
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September 17, 2019

Via ECF

Hon. Nelson S. Román
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Kevin Cook v. Officer Sutherland, et al.,
Docket No.: 7:19-cv-02780 (NSR)

Dear Judge Román:

Please be advised that we are the attorneys representing Officer Sutherland, Sheriff Carl DuBois and Officer DeWitt (hereinafter collectively the "County Defendants") in the above matter¹. We write pursuant to Your Honor's Individual Rules to request a pre-motion conference for purposes of obtaining the Court's permission to file a motion to dismiss plaintiff's complaint in its entirety as against the County Defendants on the grounds specified below, *inter alia*.

Plaintiff's complaint filed under 42 U.S.C. §1983, specifying constitutional violations under the Fourth and Fourteenth Amendments, alleges that he was subjected to verbal harassment by Officer Sutherland. Additionally, Plaintiff alleges that during a pat down of his person, Officer DeWitt kept the palm of his hand on his backside for approximately 3 minutes while Officer Sutherland watched.

"[I]t is well-settled in this Circuit that personal involvement of defendants in alleged constitutional deprivations is a prerequisite to an award of damages under § 1983." *Byng v. Wright*, (No. 09 Civ. 9924 (PKC) (JCF)), 2012 WL 967430 at * 13 (S.D.N.Y. Mar. 20, 2012) (quoting *Wright v. Smith*, 21 F.3d 496, 501 (2d Cir. 1994)). "Because vicarious liability is inapplicable to . . . § 1983 suits, a plaintiff must plead that each Government-official defendant, through the official's own individual actions, has violated the Constitution." *Ashcroft v. Iqbal*, 556 U.S. 662, 676 (emphasis added). An official may not be held liable simply because he or she holds a position of authority. *Black v. Coughlin*, 76 F.3d 72, 74 (2d Cir. 1996).

¹ Officer Sutherland incorrectly named in the caption as Officer Suterland.

*Service of Process by FAX is not accepted

Specifically, Plaintiff's complaint makes no allegations regarding Defendant DuBois and his personal involvement in the alleged constitutional violations against Plaintiff. Defendant DuBois' mere position as Sheriff of Orange County, with nothing more, is insufficient to allege a §1983 action.

Plaintiff's also complaint fails to state a § 1983 claim for a violation of his rights under the Fourteenth Amendment². *Patterson v. Ponte*, 16-cv-3156 (PAE)(JCF); 2017WL1194489 (S.D.N.Y. March 30, 2017). Plaintiff's allegations of a pat down of his person, which he admits was incidental to a cell search, fails to allege acts by prison officials which are objectively, sufficiently serious, without a legitimate penological purpose, and "undertaken to arouse or gratify the officer or humiliate the inmate." *Crawford v. Cuomo*, 796 F.3d 252, 257-58 (2d Cir. 2015); *see also Boddie v. Schneider*, 105 F.3d 857, 861 (2d Cir. 1997) (abuse that is "severe or repetitive" can be objectively, sufficiently serious conduct), *Darnell v. Pineiro*, 849 F.3d 17, 29-35 (2d Cir. 2017) (more lenient standard applies to pre-trial detainees when assessing the subjective prong). Plaintiff's claim of one incident wherein he experienced no violence, injury or humiliation fail to meet the standard. *See McCarroll v. Matteau*, 2010 WL 2346327, *4-5 (N.D.N.Y., May 17, 2010) (insufficient where prison official touched his penis during a pat down); *see also Garcia v. Watts*, 2009 WL 2777085, *6-7 (S.D.N.Y., Sept. 1, 2009) (defendant grabbed plaintiff's buttocks on two occasions and rubbed his penis against plaintiff's buttocks insufficient); *Williams v. Keane*, 1997 WL 527677, *9-11 (S.D.N.Y., Aug. 25, 1997) (insufficient where defendant put his hand down plaintiff's pants and fondled plaintiff's testicles).

Moreover, Plaintiff fails to sufficiently allege a violation under the Fourth Amendment to establish a § 1983 claim as he had no subjective expectation of bodily privacy in a clothed pat frisk search of his person in a correctional setting. Plaintiff's complaint fails to allege that CO DeWitt had no sufficient justification to conduct a pat frisk of his person. In fact, Plaintiff readily concedes that the pat down was done in connection with fight at the facility. *Covino v. Patrissi*, 967 F.2d 73, 78 (2d Cir. 1992) (routine searches of inmates, including strip searches, have long been accepted as not violative of the Fourth Amendment); *see also Eng v. Therrien*, 2008 WL 141794, at *8 (N.D.N.Y. Jan. 11, 2008) (allegations of improper pat frisks, even if true, do not violate the Fourth Amendment). Sufficient justification requires an analysis of, (1) the scope of the particular intrusion; (2) the manner in which it was conducted; (3) the justification for initiating it; and (4) the place in which it was conducted." *Harris v. Miller*, 818 F.3d 49, 58 (2d Cir. 2016), *see also Bell v. Wolfish*, 441 U.S. 520, 559 (1979). Defendant DeWitt's pat frisk as alleged by Plaintiff, which was conducted outside of his cell and for a specific penological purpose over Plaintiff's clothing was not inherently intrusive and was justified.

Lastly, Plaintiffs' complaint is barred by the Prison Litigation Reform Act of 1995 ("PLRA"). The PLRA states that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted." 42 U.S.C § 1997e(a). "Moreover, a claim must be completely exhausted prior to

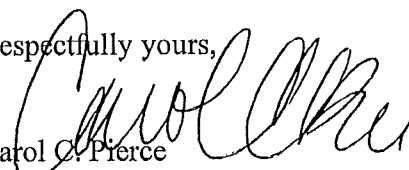
² At the time of the alleged incident in the complaint, Plaintiff was a pre-trial detainee.

*Service of Process by FAX is not accepted

commencing suit. It is insufficient to take only limited steps towards exhaustion before commencing suit, or even to exhaust a claim entirely during the pendency of the case.” *Schwartz v. Dennison*, 518 F.Supp.2d 560, 568 (S.D.N.Y. 2007). However, as is plainly evident from the face of the Complaint – and the grievances Plaintiff filed with the Court that Plaintiff did not exhaust his administrative remedies with respect to his claims against the County Defendants prior to commencing this action as mandated by the PLRA. In fact, four of the five grievances Plaintiff filed with this Court were filed *after* the complaint was filed and therefore could not have been in compliance with the PLRA.

Thank you for your consideration in this matter.

Respectfully yours,



Carol C. Pierce
Chief Assistant County Attorney

Kevin Cook, Plaintiff *Pro Se*
Orange County Correctional Facility
110 Wells Farm Road
Goshen, New York 10924

From - Kevin Cook # 201704986

To: Judge Roman?

Re: Rebut of Sharon W. Spiel
personal request to disqualify
plaintiffs complaint. 9-17-19

1. Plaintiff never stated \$
Sutherland watched ~~and~~ DeWitt
sexually insulted him. The
incidents with Sutherland
and DeWitt are separate and
are relative in the sense only
that both were sexually
harrassing the Plaintiff.

2. It is Sheriff Dubois job
to make sure the jail is
run according to ~~the~~ policy
~~the~~ procedures and professionalism.
When staff under Sheriff
Dubois distort the rules
and act unprofessionally
with reckless abandon, is
a reflection of his leadership
and unwillingness to maintain
a professional standard,

③
Plaintiff did convey this
in his complaint.

3. Officer DeWitt sexual^{ly} insult
was indeed undertaken to
arouse gratify the officer and
humiliate the plaintiff yes
they were doing cell searches
and strip searches. If the
plaintiff is to be strip searched
why was DeWitt doing his
own personal thing ~~and~~ but
for personal gratification
and the humiliation of the
plaintiff. The plaintiff is
suffering from mental and
emotional distress injury.

4. DeWitt had no sufficient
justification to conduct a pat
frisk which was more than
that when knowing the plaintiff
was to be strip searched,
which he was right after
~~he~~ what DeWitt did, "
(The ~~revised~~) when plaintiff
stated to Sgt. Campbell
DeWitt had his hand

67

On his butt Sgt. Campbell stated
"stuff like that happens
around here"

5. The plaintiff complaint
is not about conditions
at the jail but about
personnel acts of its
officers. The plaintiff
did ~~not~~ exhaust all
administrative remedies. When
it comes to officer Sutherland
plaintiff talked to a different
~~Sgt~~ Sargents asking them
to have Sutherland stop.

All these persons stated they
didn't see nothing wrong and
stated policy and procedure
says we can stand in front
of the med-cart all close
upon you to look in your mouth.
Policy and procedure state
the officer can observe
the mouth ~~is~~ says nothing
about the officer standing
front of the med-cart
invading my space when I'm
taking my meds and ~~and~~ ~~and~~ ~~and~~

5/17/19

54
things to me, when I
sought relief of officer
Sutherland actions the
a sexual harassment didn't
decrease but increase
other officers and staff
jumped in, I felt like
they were saying to me
you can't complain about
everybody, I had to tell
my mental health about it,
Officer Sutherland I believe
is trying to cause body
harm he has talked to
another inmates about me
to cause me harm I've
talked to my mental health
worker about that too,
Officer DeWitts act upon
me was humiliating and
very disturbing, when the
people who are suppose to be
a shield against sexual
aggression become the sexual
aggressor is mentally
disturbing.

5
6, In Orange County Jail you
can't walk up to the desk and
get a grievance. You have to
get it from a sergeant.

Whenever the plaintiff asked a
Sergeant for a grievance he
was asked to explain why.
After explaining why ~~the~~
the plaintiff would be
told can't try to fix or
let me look into it by
these Sergeants nothing
changed but the sexual
misconduct in fact increased.

I had to write my own
complaint on notepad paper.
I also informed Clavise Williams
my mental health worker about
~~about~~ by the hands actions
and how disturbing they were
to me. Before my complaint
my complaint was filed be-
cause I wasn't getting a
grievance. I didn't start
getting grievance until after
I complained to my mental
health worker.

(6)

The grievances after that was
to show an ongoing situation.

Deputy County Attorney -
Sharon W. Spicaal points of
contention are not valid and
her personal request ~~to dismiss~~
to dismiss complaint be denied.

~~Sincerely,~~
Sincerely,

Kevin C. Cade
#201701986

Orange County Jail
110 Wells Farm Rd.
Goshen, NY 10924

Name Kevin ROK ID# 201704986

United States District Court
Southern District of New York
Charles L. Bryant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, New York 10601

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Kevin Cook^{tt} 201704986

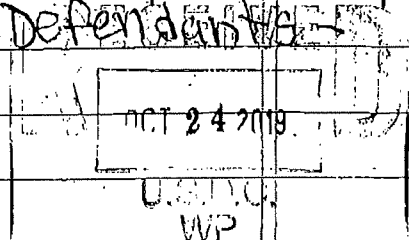
Note
Amended Response

V.

Officer Suterland, et al.,
Docket No: 19-cv-2780(NSR)

- Copy sent to Orange C.
County Attorney,
Defendant's

Hon. Nelson S. Roman
United States District Judge



Reason: Rebut to Sharon W. Spiegel request
to Judge to dismiss Complaint.

1. Plaintiff was subjected verbal and physical
sexual harassment, by the things officer Suterland
said and him waving his hand where plaintiff
but was,

2. Plaintiff never said Officer Sutherland
watched DeWitt put his hand on plaintiff
backside, that is a complete lie and a
false statement.

3. Officer DeWitt had no sufficient
justification to a pat frisk which was
more than that because plaintiff was being
taken out off cell to be striped searched
and was striped search after he insulted
sexually harassed and humiliated by putting
plaintiff on each buttocks and resting his
hand on plaintiff butt while he waited
to be taken down stairs to be striped
searched.

De Witt's actions were for sole penological purpose to arouse ~~gratify~~ and gratify himself. Plaintiff did bring this to Officer Campbell's attention.

4. There is no justification no way no how ~~for~~ for Officer De Witt's sexual insult upon plaintiff. When plaintiff goes to court they don't put us down and then say now strip. It don't make sense.

5. Plaintiff did exhaust remedies and tried to ~~be~~ get the issue with Suterland resolved to ~~no~~ no avail. I was being refused a grievance many times in the name of by telling ~~what~~ why I wanted it let them try to fix it first, to no avail. If fact the more I complained the worst it got. I ~~had~~ told Clarise Williams the mental health worker about it a couple of times before this action.

6. I did write an grievance in my own hand without a grievance form before this action and the ones after is to reflect an on going problem.

7. The act Officer De Witt committed upon the ~~the~~ plaintiff ~~in~~ in no way could or be resolved by the Jail, it was an abominable act.

8. The plaintiff is not at issue with the conditions of the jail but the acts of some of its personnel.

9. The plaintiff is at issue with ~~Sheriff~~ Sheriff Carl Dubois because

was

he ~~has~~ written the Sheriff on two different times complaining about the actions of some of his officers distorting policy and procedure and moral conduct.

10. The Plaintiff would like to, note he don't have a problem with a person being^a homosexual. Plaintiff have a problem with being imposed upon by people in their professional capacity under the pretense of doing their job.

11. The actions and inaction of the defendants has caused mental and emotional distress, anguish and ~~then~~ because their actions were being done in front of other inmates things were being said to me by some and I felt my life was being put in jeopardy.

12 Officer Suterland is not just standing in front of the med-cart in the way. He also ~~is~~ ^{is} engaging you, he asks you about your medication he passing out lab work if you had some done and when you try to ask the nurse something he do the ~~answer~~ answering. Attached is a grievance I wrote 4-5-19. At the bottom it says Officer standing in front of ~~a~~ cart (standing in the way) is in accordance ~~to~~ with Policy & Procedure. Policy & Procedure say ~~not~~ such thing. A copy of Policy & Procedure (Med line) attached.

Did not
have Policy
& Procedure
Book in
Law Library
but have
one in
Unit.
copy not
included
will send
at a later
date.

The plaintiff asks that defendants request to disqualify be denied.

Sincerely,
Kevin Cook

New York State Commission of Correction
Inmate Grievance Form
Form SCOC 7032-1 (11/2015)

Facility: Orange County Jail Housing Location: Delta 2
Name of Inmate: Cook, Kevin Grievance #: 2019-0089

Brief Description of the Grievance (Submitted by the grievant within 5 days of occurrence)
Number of Sheets Attached ()

my complain is Officer Saterland, officer Warren and maybe one or two others like to stand in front and personnel of the med cart when they escort it, I consider their motivation in doing this, an ~~invasion~~ invasion

Action requested by the grievant (Submitted by the grievant within 5 days of occurrence):
Number of Additional Sheets Attached ()

I would like the officer escorting the med cart to step out the way and let me take my medication.

Grievant Signature: Kevin Cook

Date/Time Submitted: 4-5-19

Receiving Staff Signature: [Signature]

Date/Time Received: 4-8-19 0036

Investigation Completed by: [Signature]

Date Completed: 4/15/19

Decision of the Grievance Coordinator

Number of Sheets Attached ()

Written decision shall be issued within 5 business days of receipt of grievance and shall include specific facts and reasons underlying the determination

- ☐ Non-Grievable issue as per 9 NYCRR §7032.4(h) (may not be appealed to CAO)
☐ Grievance Accepted
☒ Grievance Denied on Merits
☐ Grievance Denied due to submitted beyond 5 days of act or occurrence (can be appealed to CAO)
☐ Grievance Accepted in part/ Denied in part (Note specific Acceptance/Denial parts below)

Your grievance was investigated and found to be without merit. Officers standing in front of med cart's checking the mouth of the inmate are acting in accordance with policy & procedure.

Signature of the Grievance Coordinator: [Signature]

Date: 4/15/19

of the inmates personal space
and homosexual in nature. (10)

~~Non~~ Nancy Pelosi, D-Calif.

Stated at an event people

has to understand that

in the world we are in

now people's space is

important to them and

what's important is how

they receive it, not

necessarily how you intend

it" I don't know why

it is so hard for who ever

bring the med-cart up

to step out the way

and let me take my mod⁽²⁾
without them going
in my space. Just to be
in my space with me.

COUNTY:
FARM RD.
NEW YORK 10924

Kevin Cook #2017099818

JD

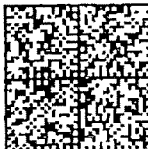
Clerk

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Southern District of New York
Charles L. Bryant, Jr.
Federal Building and United States Court House

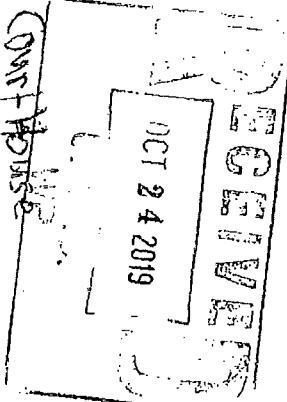
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1400 Broadway, New York, NY 10018

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Kevin Cook #201704986

Write the full name of each plaintiff or petitioner.

Case No. 19 CV 02780(NSR)

-against-

Officer Suterland #401
Sheriff Carl E. Dobis, Officer Deluca #44

Write the full name of each defendant or respondent.

NOTICE OF MOTION

PLEASE TAKE NOTICE that

Plaintiff
plaintiff or defendant

Kevin Cook #201704986
name of party who is making the motion

requests that the Court:

Rule 56)

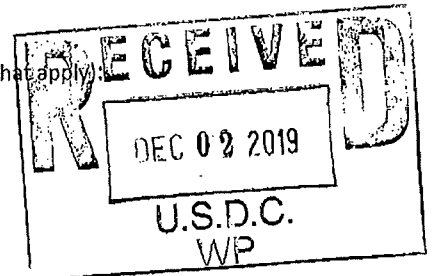
Motion of Summary Judgment

Briefly describe what you want the court to do. You should also include the Federal Rule(s) of Civil Procedure or the statute under which you are making the motion, if you know.

In support of this motion, I submit the following documents (check all that apply):

- ☐ a memorandum of law
☒ my own declaration, affirmation, or affidavit
☐ the following additional documents: Cook v. Suterland et al

19-cv-02780-NSR



Dated

Kevin Cook
Name

Signature

#201704986
Prison Identification # (if incarcerated)

Address

110 Wells Farm Rd, Goshen N.Y. 10924
City State Zip Code

Telephone Number (if available)

E-mail Address (if available)

The foregoing documents are acknowledged before me this

26 day of November

[Signature]
Notary Public

TERRENCE DOUGHTY
Notary Public, State of New York
Registration #01D06173077
Qualified in Orange County
Commission Expires Sept. 10, 2023

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Kevin Cook #201704986

Fill in above the full name of each plaintiff or petitioner.

Case No. 19 CV 02780-NSR

-against-

Suterland #404

DeWitt #194

Carl Dobis - Sheriff

Fill in above the full name of each defendant or respondent.

DECLARATION

Response to Defendant's letter to the

Hon. Nelson S. Broun to dismiss complaint. Date-9-17-19

Briefly explain above the purpose of the declaration, for example, "In Opposition to Defendant's Motion for Summary Judgment."

I, Kevin Cook, declare under penalty of perjury that the

following facts are true and correct:

In the space below, describe any facts that are relevant to the motion or that respond to a court order. You may also refer to and attach any relevant documents.

1. The defense claim the plaintiff stated officer Suterland watched DeWitt place hand on his butt. The plaintiff made no such claim or statement. It is untrue and a false statement. The incident with Suterland and DeWitt happened

different times and day,

2. The defense does not dispute the actions of Suterland or Newitt but claim it was all in the line duty. The defense if it wasn't for the purpose to arouse, gratify or humiliate it was legal. Officer Newitt took plaintiff out of cell, patted him on both buttocks the put hand on plaintiff but told him to wait and the sent down stairs to be strip searched. The plaintiff told officer Campbell, I know I'm to be strip searched what was he doing but to ~~perpetrate~~, arouse and humiliate.

3. The plaintiff is not complaining about conditions but the actions of the staff.

4. The plaintiff did seek and exhaust all remedies pertaining to Suterland to the point I told the ~~mental~~ mental health worker Clarise Williams two different times I felt like I was being sexually harassed.

Attach additional pages and documents if necessary.

Executed on (date)

Kevin Cook

Name

110 Wells Farm Rd Goshen N.Y. 10924

Address

City

State

Zip Code

Telephone Number (if available)

Kevin Cook

Signature

201704986

Prison Identification # (if incarcerated)

E-mail Address (if available)

TERRENCE DOUGHTY
Notary Public, State of New York
Registration #01DO6173077
Qualified in Orange County
Commission Expires Sept. 10, 2023

The foregoing document is acknowledged before me this

26 day of November 2019

Notary Public

ORANGE COUNTY JAIL
110 WELLS FARM ROAD
GOSHEN, NEW YORK 10924

Kevin Oak #201704986

Clerk

United States District Court

Southern District of New York

Charles L. Bryant, JR.

Federal Building and United States Courthouse

300 Quarropes Street

White Plains, New York 10601

[PRO SE Intake Unit]

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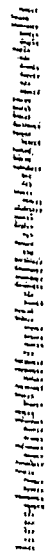
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United States District Court
Southern District of New York

Kevin Cook #201704986

- against -

Docket No. 19-cv-02780
(NSR)

Sheriff - Carl E. Dobois

Officer - Sutherland #404

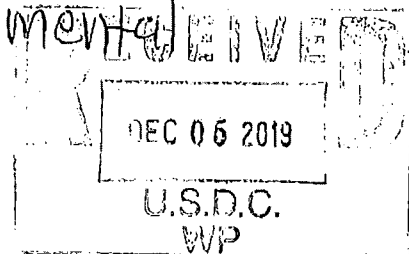
Officer - DeWitt #144

District Judge: Hon. Nelson S. Roman
Magistrate Judge: Hon. Paul E. Davison

Motion for Summary Judgement

The plaintiff asks the court to rule based upon the facts.

1. The defense does not dispute the fact that officer Sutherland sexually harassed the plaintiff. The defense argument is the plaintiff did not exhaust all remedies within the administration. The plaintiff tried and tried and wasn't given a grievance until after plaintiff brought the matter to the attention of the mental health worker.



Even then the sexual harassment didn't decrease but increase other officers and staff started to sexually harass the plaintiff too. The sexual harassment didn't abate until after this action was brought before the court.

- a. The defense does not dispute the fact that Officer Dewitt sexually assaulted the plaintiff. The defense argument is that officer Dewitt got to do unsavory and demoralizing acts under the pretense of doing his job. If the inmates are being marched out their cells and down to the showers to be strip searched why is Dewitt doing a hands on. And what do Dewitt's hands on the plaintiff butt for two or three minutes have to do with anything but to arouse, gratify (himself) and humiliate the plaintiff.

ORANGE COUNTY JAIL
110 WELLS FARM ROAD
GOSHEN, NEW YORK 10924

Kevin Cook #201704980

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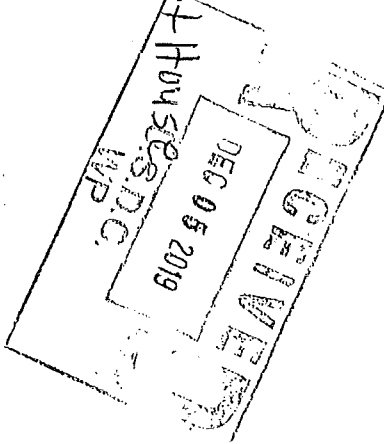
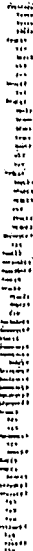


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300 Quarropas Street
White Plains, New York 10601

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UNITED STATES DISTRICT COURT
Southern District of New York

Kevin Cook #201704986

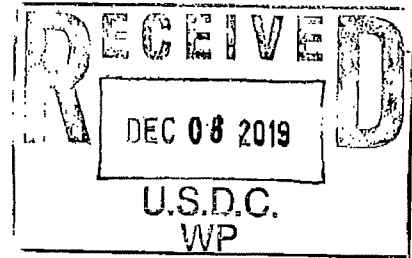
- against -

Docket No: 19-CV-02780-NSR

Officer - Suterland #404

Officer - DeWitt #144

Sheriff - Carl Delbois



District Judge: Hon. Nelson S. Roman
Magistrate Judge: Hon. Paul E. Davison

Motion for Summary Judgement

The plaintiff asks the court to rule on this matter based on the facts.

1. The defense doesn't dispute the fact that Officer Suterland sexually harassed the plaintiff. The defense argument is that the plaintiff didn't seek or exhaust all remedies. The plaintiff tried and tried to have Suterland's actions desisted to no avail. The plaintiff wasn't given a grievance until the plaintiff brought the matter to the attention of the mental health worker, and still

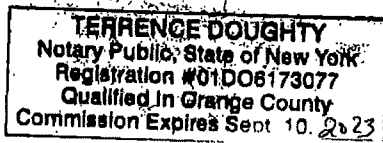
the sexual harassment did not decrease but increased. Other officers started to sexually harass the plaintiff. Officer DeWitt's actions reflect the assertion. The acts of sexual harassment didn't abate until after this complaint was filed.


2. The defense does not dispute the sexual assault Officer DeWitt acted upon the plaintiff. The defense's argument is DeWitt's act is permitted and within the ~~the~~ bounds of him doing his job. If the inmate are being taken out their cells to the showers to be strip searched why is DeWitt doing a hands ~~on~~ ^{on} the plaintiff. There is no reason why but to ~~demoralize~~ demoralize the plaintiff and gratify himself, why do DeWitt have his hand on the plaintiff butt for two to three minutes and what do his hand on the plaintiff's ~~get~~ butt got to do with the search or his job period.

DeWitts sexual assault upon the plaintiff
was clearly to arouse and gratify himself
and humiliate the plaintiff, Kevin Cook.

Date

Sincerely, Kevin Cook



The foregoing _____
before me this 2 day of December 2019


Notary Public

ORANGE COUNTY JAIL
110 WELLS FARM ROAD
GOSHEN, NEW YORK 10924

Kevin Cook # 201704986

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U.S.D.C. Southern District of New York
WP

Clerk

United States District Court

Charles L. Bryant, Jr.

Federal Building And United States Courthouse

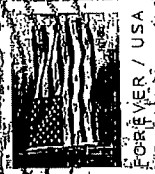
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10501-415033

LEGAL MAIL

10501-415033



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